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Wastewater Unit

Ms. Colleen Rathbone (8P-W-WW)
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

RE: Comments on Wind River Reservation Pollution Discharge Permits

Dear Ms. Rathbone:

I am submitting these comments on the following proposed permits and their statements of basis:

- Eagle Oil and Gas Company - Sheldon Dome Facility; NPDES Permit No. WY-0020338;
- Phoenix Production Company - Sheldon Dome Field; NPDES Permit No. WY-002495;
- Phoenix Production Company - Rolff Lake Unit; NPDES Permit No. WY-0024945;
- WESCO Operating, Inc. - Sheldon Dome Field; NPDES Permit No. WY-0025607; and
- WESCO Operating, Inc. - Tensleep #1 (also known as Winkleman Dome); NPDES Permit No. WY-0025232

In summary, these proposed permits are incomplete and do not address an array of effluents which will be discharged. In addition, the permits put wildlife and livestock which drink the produced water at risk. Finally, the monitoring requirements proposed in these permits are impermissibly lax.

For the reasons listed below, I urge that the proposed permits should be rejected.

I. Many Toxic Chemicals Not Listed in Permit.

II. Permits Lack Limits for Discharge of Toxic Chemicals

III. Effects on Wildlife and Livestock Undisclosed

IV. Permits Lack Adequate Monitoring Standards

V. Permits Do Not Meet EPA Standards

VI. EPA Permits Less Stringent than Wyoming Standards

VII. VII. Conclusion and Recommendations

In their current state, the Wind River permits should be rejected because they are incomplete, un-protective, and fail to meet important EPA permit standards. A number of changes are needed to make these permits minimally passable:

1. The permits should require the disclosure of all chemical programs occurring at the facility, including well maintenance, acid stimulation, and fracking.
2. The permits should mandate the testing of chemicals not listed in WQS but are listed in MSDS that could cause animal and human health risks.
3. The permits need to require monitoring after bi-monthly well maintenance and fracking events.

Unless these Wind River permits can become more encompassing and achieve their intended goals as NPDES permits, they should be rejected. The EPA has been charged with protecting both water quality and public health, but has ignored that charge with these permits.

Respectfully submitted,



Bill Carter